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Attorneys for Defendants
UBER TECHNOLOGIES, INC., RASIER, LLC,
And RASIER-CA, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

This Document Relates to:

ALL ACTIONS

Case No. 3:23-md-03084-CRB (LJC)

**DECLARATION OF CHRISTOPHER V.
COTTON**

Judge: Hon. Charles R. Breyer
Courtroom: 6 – 17th Floor

1 I, Christopher V. Cotton, state as follows:

2 1. I am an attorney at Shook, Hardy & Bacon L.L.P., counsel of record for Defendants Uber
3 Technologies, Inc., Raiser, LLC, and Raiser-CA, LLC (collectively, “Uber” or “Defendants”). I offer
4 this Declaration in the above-captioned matter in support of Uber’s Administrative Motion to Seal
5 Personal Identifying Information Contained in Defendants’ Motion for Entry of Order Related to
6 Receipts and Accompanying Documents.

7 2. In an effort to seek Plaintiffs’ agreement to the relief sought in the above-referenced motion,
8 counsel for Uber initiated a meet-and-confer process.

9 3. On August 19, 2025, I sent a letter on behalf of Uber to Plaintiffs’ counsel, copying MDL
10 leadership, that requested to promptly meet and confer regarding the aforementioned Plaintiffs’
11 noncompliance with the Receipt Order.

12 4. Plaintiffs’ counsel did not initially respond to my August 19, 2025 letter requesting to meet and
13 confer. On August 20, 2025, I followed up with Plaintiffs’ counsel, requesting their availability the next
14 day (August 21) to meet and confer.

15 5. On August 21, 2025, I had a meet-and-confer via Zoom with the Pulaski Firm, counsel for
16 Plaintiffs with MDL IDs 2642, 3841, and 3659. No agreement was reached regarding the appropriate
17 course of action for these Plaintiffs’ cases.

18 6. On August 21, 2025, I followed up with counsel for the remaining Plaintiffs identified in my
19 August 19, 2025 letter, requesting their availability that day to meet and confer.

20 7. Later that day, on August 21, 2025, I heard back from Peiffer Wolf, former counsel for Plaintiff
21 with MDL ID 1384. Peiffer Wolf responded to my email: “We withdrew as counsel and the case was
22 dismissed without prejudice.”

23 8. Later on August 21, 2025, I followed up again with Plaintiffs’ counsel, noting that I had not
24 received any response from Levin Simes LLP, Kherker Garcia, or Nachawati Law Group. I notified
25 Plaintiffs’ counsel that I would schedule a call the next day (August 22) at 11:30 AM Pacific to discuss
26 the cases of the remaining Plaintiffs identified in my August 19, 2025 letter.

27 9. Kherker Garcia, counsel for Plaintiff with MDL ID 2774, declined the meeting invitation.
28

10. Levin Simes LLP, counsel for Plaintiff with MDL ID 1199, initially accepted the meeting invitation.

11. The next day, August 22, 2025, none of Plaintiffs' counsel showed up to the scheduled meeting at 11:30 AM Pacific. I kept the line open for 30 minutes, but Plaintiffs' counsel did not appear.

12. Despite my repeated efforts to meet and confer with Plaintiffs' counsel, no agreement was reached with Plaintiffs' counsel regarding the sealing of personally identifying information ("PII") contained in Uber's Motion for Entry of an Order to Show Cause Why 6 Plaintiffs Who Have Submitted Non-Bona-Fide Receipts Should Not Be Dismissed with Prejudice and accompanying documents.

13. Sealing the PII in Uber's motion and accompanying documents is necessary to avoid significant and avoidable harm or embarrassment to the affected individuals by public disclosure. Moreover, no less restrictive alternative to sealing that information exists.

I declare under the penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: August 25, 2025

Respectfully submitted,

By: 

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